

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: **Kevin C. Fountain aka
Kevin Charles Fountain aka Kevin
Fountain**

Debtor(s)

**Rocket Mortgage, LLC f/k/a Quicken
Loans, LLC f/k/a Quicken Loans Inc.**
Movant

vs.

**Kevin C. Fountain aka Kevin Charles
Fountain aka Kevin Fountain**

Debtor(s)

Scott F. Waterman,

Trustee

BK NO. 21-12391 PMM

Chapter 13

Related to Document 30

**RESPONSE TO DEBTORS MOTION PURSUANT TO BANKRUPTCY CODE
SECTION 363 FOR AUTHORITY TO SELL REAL ESTATE LOCATED AT 2606
CUMBERLAND AVE, READING, PENNSYLVANIA 19606 FREE AND CLEAR
OF LIENS AND ENCUMBRANCES AND TO PERMIT DISTRIBUTION OF
SALE PROCEEDS**

Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. enters its response to the Debtor's Motion to Pursuant to Bankruptcy Code Section 363 for Authority to Sell Real Estate Located at 2606 Cumberland Ave, Reading, Pennsylvania 19606 Free and Clear of Liens and Encumbrances and to Permit Distribution of Sale Proceeds.

1. Creditor's loan is secured by a mortgage on Debtor's property at 2606 Cumberland Ave., Reading, PA 19606.

2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full.

WHEREFORE, the Movant, Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a

Quicken Loans Inc., prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Respectfully submitted,

Date: January 19, 2024

/s/ Michael P. Farrington
Michael P. Farrington, Esquire
Attorney I.D. 329636
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BNY Mellon Independence Center
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Philadelphia, PA 19106
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kevin C. Fountain aka Kevin Charles Fountain aka Kevin Fountain
Debtor(s)

Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.
Movant
vs.

Kevin C. Fountain aka Kevin Charles Fountain aka Kevin Fountain
Debtor(s)

Scott F. Waterman,
Trustee

BK NO. 21-12391 PMM

Chapter 13

CERTIFICATE OF SERVICE

**RESPONSE TO DEBTORS MOTION PURSUANT TO BANKRUPTCY CODE
SECTION 363 FOR AUTHORITY TO SELL REAL ESTATE LOCATED AT 2606
CUMBERLAND AVE, READING, PENNSYLVANIA 19606 FREE AND CLEAR
OF LIENS AND ENCUMBRANCES AND TO PERMIT DISTRIBUTION OF SALE
PROCEEDS**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on January 19, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Kevin C. Fountain aka Kevin Charles Fountain aka
Kevin Fountain
2606 Cumberland Avenue
Reading, PA 19606

Attorney for Debtor(s) (via ECF)
Shawn J. Lau, Esq.
Lau & Associates
4228 St. Lawrence Avenue
Reading, PA 19606

Trustee (via ECF)

Scott F. Waterman
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Method of Service: electronic means or first-class mail.

Dated: January 19, 2024

/s/ Michael P. Farrington
Michael P. Farrington Esq.
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